REMARKS

Claims 1-51 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 102(e) Rejection:

The Office Action rejected claims 1, 18 and 35 under 35 U.S.C. § 102(e) as being anticipated by He et al. (U.S. Patent 6,088,451) (hereinafter "He"). Applicants respectfully traverse this rejection in light of the following remarks.

Regarding claim 1, applicants respectfully disagree with the Examiner and submit that He fails to teach a client using a capability credential to *request* an access interface document to access a service, the client *receiving* the access interface document, wherein the access interface document comprises an *interface* for accessing only a portion of the service's capabilities, and the client using the interface *from the access interface document* to access a capability from the portion of the service's capabilities. He presents a system for *securing access* to network elements by user elements (He, Abstract). He does not disclose anything regarding an access interface document comprising an interface to accessing only a portion of a service's capabilities, as the Examiner contends. Instead, He teaches a hierarchy of tickets that are used for access control. He also teaches controlling access to network elements through the use of an authentication server, a credential server and a network element access server (He, column 2, lines 12-16). He is not concerned with access interface documents by which a client accesses a service. The access control credentials and tickets, such as He's general and session tickets, are used *only for access control*, not as access interface documents.

He fails to teach a client using the capability credential *to request an access interface document* to access the first service. The Examiner cites column 20, line 14 through column 21, line 22 of He, however applicants note that this passage describes He's ticket system in which a user presents a general ticket obtained from a credential

server to a network element access server to receive a session ticket (He, column 20, lines 16 –19). Thus, He teaches that a general ticket, provided to a user during login, is used to obtain a session ticket that includes a unique session encryption key (He, column 2, lines 36-51). He's session ticket is certainly not an access interface document and obtaining such a session ticket cannot be considered requesting an access interface document. Nowhere does He disclose anything regarding a client using a capability credential to *request an access interface document* to access the first server. No credential or ticket in He is an <u>access interface document</u> comprising <u>an *interface* for accessing only a portion of the first service's capabilities</u>. In fact, He teaches explicitly that a session ticket "is encrypted using a key derived from the password of the selected network element so that only the selected network element can verify the session ticket" (He, column 2, lines 51-55). He's session ticket is clearly an authentication credential used by network elements to verify communications from the user and just as clearly does not include an access interface document.

Further regarding claim 1, applicants submit that He also fails to teach the client *receiving* the access interface document, wherein the access interface document *comprises an interface for accessing* only said portion of the first service's capabilities. The Examiner holds that He discloses this by teaching how a user may gain access to pull down menus in order to choose a specific network element with which to communicate. However, the pull-down menus of He are not access interface documents, but are merely a mechanism by which a user may select a particular network element to communicate with. Applicants submit that the Examiner has not shown any teaching in He that discloses the receiving of an access interface document. The Examiner contends that when a user of He's system is given access to such pull down menus to identify network elements, a client is receiving an access interface document that comprises an interface for accessing only a portion of a service's capabilities. He, however, teaches that the user may use the pull down menus to make an access request for a particular network element (He, column 26, lines 60-62). Allowing a user to access pull down menus to select a desired network element does not constitute receiving an access interface document. The pull-down menus of He only allow a user to select a particular network element and do

not comprise an interface for accessing only a portion of a service's capabilities, as the Examiner suggests. He uses pull-down menus only in their traditional use as user interface elements allowing users to select a specific entry. No one of ordinary skill in the art would interpret such pull down menus as access interface documents. He does not mention anything about receiving an access interface document, nor about the use of pull down menus involving any access interface document comprising an interface for accessing a portion of a service's capabilities.

The Examiner also asserts that a user (in He's system) using a pull down menu to make an access request corresponds to a client using the interface from the access interface document to access a capability from said portion of the first service's capabilities. Applicants disagree with the Examiner's interpretation of He. He teaches that once the user selects a desired network element through a pull down menu, the user element local access control system sends an access request to the network security server that "returns a session ticket to the user element for communicating with the selected network element" (He, column 27, lines 40-47). Thus, the Examiner's interpretation of He is clearly incorrect. The Examiner holds that obtaining a session ticket equates to requesting an access interface document and that selecting a network element in order to obtain a session ticket corresponds to using the received access interface document. For the Examiner's interpretation to be correct, a user would have to use a received access interface document (by selecting a network element through a pull down menu, according to the Examiner) before actually requesting the access interface document (by obtaining the session ticket, in the Examiner's interpretation). Such an interpretation cannot be correct.

Further, He describes how a session ticket includes a unique session encryption key. Thus, when the user selects a network element, the user is actually performing an authentication function by presenting a general ticket in order to obtain a session encryption key with the session ticket. Hence, He teaches that a user selects a specific network element from a pull down menu to request a session ticket and encryption key to allow future access to the network element and is clearly not teaching that such an action

includes using an *interface from an access interface document* to access a capability from a portion of a service's capabilities.

Applicants respectfully remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of <u>each and every element</u> of the claimed invention, <u>arranged as in the claim</u>. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The <u>identical</u> invention must be shown <u>in as complete detail</u> as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

In light of the above remarks, Applicant submits that the rejection of claim 1 is not supported by the teachings of the cited art and withdrawal thereof is respectfully requested. Similar arguments apply in regard to independent claims 18 and 35.

Section 103 (a) Rejection:

The Office Action rejected claims 2-17, 19-34 and 36-51 under 35 U.S.C. § 103(a) as being unpatentable over He in view of Pulliam et al. (U.S. Patent 6,609,108) (hereinafter "Pulliam").

Regarding claim 2, He in view of Pulliam fails to teach wherein using a capability credential to request an access interface document comprises <u>sending an advertisement request message in a data representation language</u>, wherein the advertisement request message includes the capability credential, as asserted by the Examiner. The Examiner recognizes that He fails to teach sending an advertisement request message in a data representation language, and relies upon Pulliam to disclose this functionality. Pulliam teaches an online shopping communication schema for communication online shopping orders such as vehicle orders (Pulliam, Abstract) and has nothing to do with a client requesting an interface document comprising an interface usable by the client to access only a portion of a service's capabilities.

Pulliam teaches that a client may request a list of identifier and value pairs for a number of criteria and may use the returned values to populate pull-down lists of available automobile makes and models (Pulliam, column 13, lines 31-37). The Examiner holds that such pull-down lists are an access interface document to access the available makes and models. Applicants disagree. Pulliam never mentions anything regarding an access interface document, nor about using such pull-down lists as an access interface document that comprises an interface for accessing a portion of a service's capabilities. In contrast, Pulliam teaches that the client uses the pull-down lists and a user's selections among the pull-down lists to compile an XML message "that requests a list of matching vehicles in inventory database 612" (Pulliam, column 13, lines 37-49). Thus, rather than being an access interface document as the Examiner contends, the pull-down lists, and the data that make up such lists, are clearly just search criteria, and therefore just data, to be sent as part of a database search request.

Additionally, Pulliam fails to disclose anything regarding sending an advertisement request message. Advertisement request messages are well understood in the art and have nothing to do with searching an online automobile database according to user specified search criteria. The Examiner's cited passages (Pulliam, column 14, lines 34-45, and column 15, lines 38-42) refer only to a locate server that uses PKI encrypted user credentials to provide access control. Neither of these passage teaches anything regarding sending an advertisement request message in a data representation language. Even through Pulliam teaches the use of XML to describe the search criteria and the corresponding search results (Pulliam, column 13, lines 25-29), Pulliam fails to teach sending an *advertisement request message* in a data representation language. Applicants submit that sending an advertisement request message is very different than sending search criteria and search result messages in XML. Just because XML is a data representation language, does not mean that using XML for search criteria or search result messages corresponds to sending an advertisement request message.

Furthermore, applicants submit that the proposed combination of He and Pulliam, as suggested by the Examiner, would not result in any system that includes sending an

advertisement request message in a data representation language as part of using a capability credential to request an access interface document. Instead, such a combination would result in an online automobile search system that uses He's general and session security tickets to obtain authorization for user searches of available vehicles. Since both He and Pulliam fail to teach anything regarding using a capability credential to request an access interface and both also fail to disclose sending an advertisement request message in a data representation language, the proposed combination of He and Pulliam would not include such features.

In the Response to Arguments section of the Office Action, the Examiner states, "one cannot show nonobviousness by attacking the references individually where the rejections are based on combination of references." However, applicants specifically stated, as part of the previous argument, "even if He's system was modified so that a user requested a ticket by sending a request message in a data representation language, the request would still be for just a ticket, not an interface document comprising an interface usable by the client to access only a portion of a service's capabilities" (See Response dated June 28, 2004, page 14, lines 10-13). **The examiner has failed to provide any specific response to applicants' previous arguments in regard to claim 2.**

Thus, the rejection of claim 2 is not supported by the teachings of the cited art and withdrawal thereof is respectfully requested. Similar arguments apply in regard to claims 19 and 36.

Regarding claim 4, He in view of Pulliam does not teach <u>generating a custom advertisement</u> in response to receiving the advertisement request message. Additionally, He in view of Pulliam <u>fails to disclose</u> that a custom advertisement is <u>generated according to the portion of the service's capabilities</u> that the capability credential indicates the client is allowed to access, and <u>sending an advertisement request response message</u> to the client, wherein the advertisement request response message includes the custom advertisement as the access interface document. The Examiner's rejection states, "generating pull-down menus to identify those *capabilities* to which the client is allowed

to access" (emphasis added) citing He, column 26, lines 58-65 and Pulliam, column 13, lines 34-40). However, the pull-down menus in He and Pulliam referred to by the Examiner have nothing to do with generating a custom advertisement as the access interface document according to the portion of the service's capabilities that the capability credential indicates the client is allowed to access. He's pull down menus "identify those network elements to which [the user] is allowed access." The cited section of Pulliam pertains to "pull-down lists of available makes and models" which may be used to select "preferences" for "matching vehicles" as described above regarding claim 2. Pulliam's teachings have nothing to do with generating a custom advertisement according to a portion of a service's capabilities.

Furthermore, the Examiner refers to He's and Pulliam's pull-down menus as identifying *capabilities*. He, however, does not teach using pull-down menus to identify *capabilities*, but instead uses pull-down menus to identify those specific network elements with which a user may communicate (He, column 26, lines 58-65), not any particular capabilities or portions of the capabilities of a service that a user may access. Similarly, Pulliam never describes pull-down menus as identifying service capabilities. Instead, Pulliam uses pull-down lists as one example of collected search criteria from a user (Pulliam, column 13, lines 34-37). The Examiner is clearly applying his own speculation to the teachings of He and Pulliam.

Applicants submit that He and Pulliam, both singly and in combination, fail to teach generating and sending, in response to receiving the advertisement request message, an advertisement request response message which includes a custom advertisement generated according to a portion of a service's capabilities that a client is allowed to access as indicated by a capability credential. Therefore, the rejection of claim 4 is not supported by the teachings of the cited art and withdrawal thereof is respectfully requested.

Regarding claim 5, He in view of Pulliam does not teach or suggest a custom advertisement that specifies an XML schema *defining* messages to be sent by the client to

the service and messages to be sent from the service to the client to use the portion of the service's capabilities. The portions cited by the Examiner (Pulliam, column 15, lines 39-43 and column 16, lines 40-50) refer to the use of XML "to support application-to-application data exchange formats." In Pulliam, XML is used to describe the *data content* of messages, not to define the messages themselves. XML, as used by Pulliam does not define messages to be sent by the client to the service nor messages to be sent from the service to the client to use the portion of the service's capabilities.

In response to the above argument, the Examiner cites the same portions of Pulliam (column 15, lines 39-43, and column 16, lines 40-50) discussed above and refers to Pulliam's use of XML to send various messages. However, Pulliam does not mention an XML schema defining messages to be sent by the client to the service, nor does he describe messages to be sent from the service to the client. Applicants submit that Pulliam's use of XML message to exchange data between applications does not include such an XML schema. In fact, Pulliam himself describes the format of the messages used in his system (Pulliam, column 16, line 45 – column 17, line 29). Hence, rather than teaching a custom advertisement that specifies an XML schema defining messages, Pulliam describes the specific XML tags and message formats used in his system.

The rejection of claim 5 is further improper because the Examiner has not explained how Pulliam suggests modifying He's system. The use of an XML schema in Pulliam to describe data to be exchanged in online shopping does not have any relevance to the access control ticket requests in He. Therefore, the combination of references is improper.

In light of the above remarks, applicants submit that the rejection of claim 5 is not supported by the cited prior art and removal thereof is respectfully requested. Similar arguments apply in regard to claims 22 and 39.

Regarding claim 6, He in view of Pulliam fails to teach the client receiving a protected advertisement for the first service, wherein the protected advertisement

provides an address to request said security credential. The Examiner contends that He teaches that a user authenticates to the network and "obtains an authentication ticket that contains, or redirects the user to, the address of credential server 204", citing column 17, lines 55-67 and column 18, lines 1-23 of He. However, applicants note that neither of the cited passages describe anything about an authentication ticket containing or redirecting the user to the address of credential server 204. Instead, He teaches that a user sends a request message to authentication server 202 for user authentication and further teaches that authentication server 202 sends "a general ticket for the user to communicate with the credential server 204" (He, column 17, line 66 – column 18, line 2). Nowhere does He describe this general ticket as containing, or redirecting the user to, the address of credential server 204. In fact, He teaches, "the *content of the ticket is not able to be observed* and cannot be changed by the user, thanks to the encryption/decryption ... applied to the ticket" (emphasis added) (He, column 18, lines 13-17). Such a ticket (whose content cannot be examined) cannot contain, or redirect the user to, the address of the credential server as asserted by the Examiner. The Examiner is clearly applying his own speculation into the teaching of He regarding the contents of the general authentication ticket.

Thus, the rejection of claim 6 is not supported by the cited prior art and removal thereof is respectfully requested. Similar arguments apply in regard to claims 23 and 40.

Applicants also assert that the rejections of numerous ones of the dependent claims are further unsupported by the cited art. However, since the rejections of each of the independent claims have been shown to be improper, a further discussion of the rejections of the dependent claims is not necessary at this time.

Information Disclosure Statements:

Applicants note that the Examiner has not returned the signed and initialed copies of the forms PTO-1449 from the information disclosure statements submitted on July 19, 2001 and October 9, 2003, respectively. Applicants request the Examiner to carefully

consider the listed references and return copies of the signed and initialed Forms PTO-1449 from both of these statements. Copies of the previously submitted forms PTO-1449 from these statements are included herewith for the Examiner's convenience.
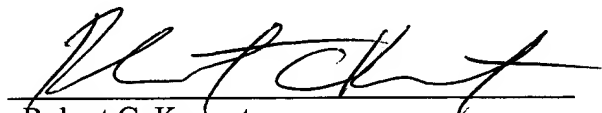
CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-70500/RCK.

Also enclosed herewith are the following items:

☒ Return Receipt Postcard

☐ Petition for Extension of Time

☐ Notice of Change of Address

☒ Copies of previously submitted forms PTO-1449 from the information disclosure statements submitted on July 19, 2001 and October 9, 2003, respectively

☐ Other:

Respectfully submitted,

Robert C. Kowert
Reg. No. 39,255
ATTORNEY FOR APPLICANT(S)

Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C.
P.O. Box 398
Austin, TX 78767-0398
Phone: (512) 853-8850

Date: ___October 11, 2004___